

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

vs.

TONYA BLACKWOOD (03)

Criminal No. 4:15-CR-151-O  
[Relates to Motion referred to  
Magistrate Judge Jeffrey L. Cureton]

GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION TO AMEND  
A CONDITION OF PRETRIAL RELEASE

The United States Attorney for the Northern District of Texas, in response to the defendant **Tonya Blackwood's** Motion to Amend a Condition of Pretrial Release, would respectfully show this Court the following:

The government opposes the defendant's motion primarily because Tonya Blackwood and Jacki Lynn Watters are co-conspirators/co-defendants, as detailed in the criminal complaint sworn against Watters (4:15-MJ-333). Specifically, Blackwood directed Watters and others to collect drug debts owed to her. *Id.* Moreover, there are indications in the criminal complaint that either Watters or someone with Watters used a firearm in connection with collecting drug debts for Blackwood. *Id.* And despite Blackwood's claim to being common-law-married to Watters, when given the chance to discuss his relationship with Blackwood at Blackwood's detention hearing on June 18, 2015, in front of this Court, Watters never claimed or asserted such a relationship. Watters only stated that he was a caretaker of sorts for Blackwood.

Furthermore, in her pretrial services report Blackwood indicated that Watters was her boyfriend not her common-law spouse. It is terribly convenient, and quite unbelievable, to now claim to be in a common-law marriage with Watters when they have never before asserted such status. In any event, given their drug relationship and the fact that Blackwood's trial is scheduled for September 8, 2015, these co-conspirators/co-defendants should not be allowed to communicate with each other.

Respectfully Submitted,

JOHN R. PARKER  
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*/s/ Shawn Smith*  
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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2015, I electronically filed the foregoing Government's Response with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorney of record who has consented in writing to accept this Notice as service of this document by electronic means: Robert Kersey.

*/s/ Shawn Smith*  
SHAWN SMITH  
Assistant United States Attorney